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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE

AARON SIEGEL, JASON COOK,
JOSEPH DELUCA, NICOLE
CUOZZO, TIMOTHY VARGA,
CHRISTOPHER STAMOS, KIM
HENRY, AND ASSOCIATION OF
NEW JERSEY RIFLE AND PISTOL
CLUBS, INC.,

Plaintiffs,

v.

MATTHEW J. PLATKIN, in his
official capacity as Attorney General of
the State of New Jersey, PATRICK J.
CALLAHAN, in his official capacity as
Superintendent of the New Jersey
Division of State Police,

Defendants.

Hon. Karen M. Williams, U.S.D.J.
Hon. Ann Marie Donio, U.S.M.J.

Docket No. 22-CV-7463

**Attorney Declaration of Angela Cai
In Support Of Defendants'
Opposition To Plaintiffs' Motion For
Temporary Restraining Order**

I, ANGELA CAI, of full age, hereby declare as follows:

1. I am employed as Deputy Solicitor General by the State of New Jersey, Department of Law and Public Safety. I provide this Declaration in support of Defendants' Opposition to Plaintiffs' Motion for a Temporary Restraining Order.

2. Attached to this Declaration are true and accurate copies of the following Exhibits cited in the State's Brief In Opposition:

1. P.L. 2022 ch. 131, A4769/S3124, An Act concerning the sale and possession of firearms and supplementing and amending various parts of the statutory law.
2. Compilation of:
 - a. Order, D.E. 41, *Christian v. Nigrelli*, No. 22-2987 (2d Cir. Dec. 12, 2022);
 - b. Order, D.E. 75, *Antonyuk v. Hochul*, No. 22-2908 (2d Cir. Dec. 7, 2022);
 - c. Order, D.E. 53, *Hardaway v. Nigrelli*, No. 22-2933 (2d Cir. Dec. 7, 2022).
3. Transcript of Preliminary Injunction Hearing, *Corbett v. Hochul*, 1:22-cv-5867-LGS (S.D.N.Y. Nov. 29, 2022).
4. 63 Proceedings and Acts of the Maryland General Assembly 338, § 5 (June 15-July 3, 1773).
5. 1870 Tex. Gen. Laws 63.
6. 1786 Va. Laws 25.
7. Gen. Digest of the Ordinances & Res. of the Corp. of New Orleans 371 (1831).
8. 1869-70 Tenn. Pub. Acts 23.
9. Art. 320, Tex. Act of April 12, 1871.

10. Mo. Rev. Stat. 1879, at 224 (§ 1274).
11. 1859 Conn. Acts 62, ch. 82, § 5.
12. 1867 Kans. Sess. Laws 25.
13. 1771 N.J. Laws 346, §1.
14. 1865 La. Extra Acts 14, No. 10 § 1.
15. 1876 Iowa Acts 142, ch. 148, § 1.
16. 1929 Iowa Acts 90, § 30.
17. 1919 Me. Laws 193.
18. Ark. Rev. Stat. § 13, p. 280 (1838).
19. 1839 Ala. Acts no. 77, § 1.
20. 1821 Tenn. Acts ch. 13, § 1.
21. Ian Ayres & Spurthi Jonnalagadda, Guests with Guns: Public Support for “No Carry” Defaults on Private Land, 48 J. L. Medicine & Ethics 183, Table A4 (2020).
22. 1873 Ga. Code 818, § 4528.
23. Fourth Annual Report of the Board of Commissioners of the Central Park 106 (1861).
24. Acts of Assembly Relating to Fairmount Park 18 (1870).
25. Michael John Sullivan, *The Revised Ordinance of the City of St. Louis, Together with the Constitution of the United States, Constitution of the State of Missouri, the Scheme for the Separation of the Governments of the City and County of St. Louis, the Charter of the City, and a Digest of the Laws Applicable to the City* 635 (1881), § 3.
26. Egbert Jamieson and Francis Adams, *The Municipal Code of Chicago, Comprising the Laws of Illinois Relating to the City of Chicago and the Ordinances of the City Council, Codified and Revised* 391 (1881). Art XLIII, § 1690.

27. Annual Reports of the City Officers and City Boards of the City of Saint Paul 689 (1889).

28. W.W. Thompson, *A Digest of the Acts of Assembly Relating To, and the General Ordinances of the City of Pittsburgh, From 1804 to Jan. 1, 1897* at 496 (2d Ed. 1897).

I declare that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

I certify that on December 30, 2022, I electronically filed the foregoing Declaration and Exhibits with the Clerk of the United States District Court for the District of New Jersey. Counsel for all parties are registered CM/ECF users and will be served via CM/ECF.

By: /s/ Angela Cai
Angela Cai
Deputy Solicitor General

December 23, 2022